

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America

v.

Braiden Williams

Case No. 23-mj-1014

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 17, 2023 in the county of Montgomery in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. § 2261A(2)

Offense Description

On or about May 17, 2023, in the Eastern District of Pennsylvania, the defendant, Braiden Williams, with the intent to injure, harass, and intimidate another person, used interactive computer services and electronic communication services of interstate commerce, including Internet-based social media platforms and electronic messaging applications, to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to that person, in violation of Title 18, United States Code, Section 2261A(2).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.

s/ Zachary Fuller

Complainant's signature

Zachary Fuller, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/17/2023

Lynne A. Sitarski
Digitally signed by
Lynne A. Sitarski
Date: 2023.05.18
10:55:03 -04'00'

/s/ Lynne A. Sitarski

*Judge's signature*City and state: Philadelphia, PA

The Hon. Lynne A. Sitarski, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT AND WARRANT

I, Zachary Fuller, being first duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I submit this affidavit in support of an application for a warrant to arrest BRAIDEN WILLIAMS, assigned Bureau of Prison Register Number 12552-510, for violations of 18 U.S.C. § 2261A (stalking). WILLIAMS is currently residing at 111 Taylor Street, San Francisco, California where he is awaiting trial on multiple cybercrimes as detailed below.

2. Since May 2018, I have been a Special Agent with the Philadelphia Federal Bureau of Investigation (“FBI”) assigned to the Criminal Cyber Squad and Philadelphia Cyber Task Force. During my employment with FBI, I have conducted numerous criminal cyber investigations involving online communication forums using and exploitation of information technologies. My responsibilities as a member of the Task Force include investigating cybercrimes, seeking and executing arrest and search warrants, monitoring Title III intercepts, and assisting the FBI Cellular Analysis Survey Team (“CAST”) in responding to requests submitted by law enforcement agencies. Specifically, I assist CAST with cellular record analysis, technical assistance, and mapping, and conducting tracking missions using historical cell site analysis in order to geo-locate target cell phones used by subjects, accomplices, fugitives, witnesses, and/or victims of crimes.

3. I am currently involved in an investigation of cyberstalking by WILLIAMS and other co-conspirators who have threatened to commit bombings of numerous universities throughout the United States. WILLIAMS and the other co-conspirators also harassed a juvenile victim and her juvenile sister, whose identities are known to me but are identified as VICTIM A and VICTIM B in this affidavit to preserve their privacy. Based on my investigation, as set forth below, I believe that WILLIAMS with the intent to injure, harass, and intimidate another person,

used interactive computer services and electronic communication services of interstate commerce, including Internet-based social media platforms and electronic messaging applications, to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to that person, in violation of Title 18, United States Code, Section 2261A(2).

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2261A have been committed by WILLIAMS.

Statutory Authority

6. Title 18 United States Code § 2261A provides, in pertinent part, that “whoever travels in interstate or foreign commerce . . . and in the course of, or as a result of, such travel or presence engages in conduct that places that person in reasonable fear of the death of, or serious bodily injury to that person . . . or would be reasonably expected to cause substantial emotional distress to a person . . . shall be punished.” 18 U.S.C. § 2261A(1)(A)(i), 2261(A)(1)(B).

PROBABLE CAUSE

Investigation of Ambler, Pennsylvania Swatting Attacks

7. In or about March of 2021, the Ambler Police Department received multiple suspicious activity calls for a residence located in Ambler, Pennsylvania (“VICTIM ADDRESS 1”), which is in Montgomery County in the Eastern District of Pennsylvania. Ambler Police Department received these calls through their 911 reporting center at the Montgomery County Radio Room located in Eagleville, Pennsylvania. The callers reported several fabricated incidents to generate a large police response at VICTIM ADDRESS 1 due to the graphic and threatening nature of the calls. The unidentified callers reported bomb threats and shootings, which Ambler Police Department determined to be false. These types of calls are commonly referred to as “Swatting.”

8. Based on my training and experience, I know that “Swatting” a residence or institution occurs when an individual contacts 911 anonymously and reports a fake emergency to elicit law enforcement or SWAT Teams to be dispatched to the provided address. This is often done to harass or terrorize the individual(s) at the provided address by having law enforcement arrive at that address on numerous occasions at various times of the day. Swatting calls often originate from online communities and target a person that does not live in the same geographical location, using various obfuscation techniques such as Voice Over Internet Protocol (“VOIP”) calls and proxy Virtual Private Networks “VPNs.” Additionally, Swatting attacks can be accompanied by physical acts such as “bricking”, where an actual brick is thrown through the targeted address’s front window. Bricking attacks are often recorded by the individual(s) conducting the act and posted online to show proof of that attack. The individual(s) conducting bricking attacks are often paid in cryptocurrency by a separate person who hires the attack. These attacks are also committed in order to harass a targeted victim.

9. Due to the frequency of Swatting calls targeting VICTIM ADDRESS 1, Ambler Police Department has spent a considerable amount of time investigating these incidents. In one incident, Ambler Police Department and Temple University Police Department received an email from a person claiming to be “VICTIM A”¹ who lived at VICTIM ADDRESS 1. The email stated that she would kill herself if money was not sent to her email address “[VICTIM A]yup123[at]protonmail.com.” Through my experience, I know that ProtonMail is an email provider located in Switzerland that generally does not respond to U.S. legal process requests.

10. Below are additional more recent examples of Swatting attacks as detailed in Ambler Police Department reports. The caller in each of these Swatting attacks gave VICTIM ADDRESS 1 as the address of the incident.

- a. On April 10, 2023, at approximately 4:20 p.m., the Montgomery County Radio Room received a call from the telephone number (803) 814-5378. The caller provided the name Axel Umesh. The caller stated that he shot his wife and kids and is about to shoot someone else. The caller said he has bombs in the front yard and will set them off when he shoots the male. The caller said he shot his wife and kid each two times in the heart. The caller reported they are dead and he shot his wife twenty minutes ago. The dispatcher noted that there was no background noise. The caller said bombs are buried in the front yard. He is going to wait for the officer to arrive so he can shoot them then set off the bombs. The Ambler Borough Police Department responded to the scene and determined that this was another false call. The phone number came back to Bandwidth.com which later advised that the number was assigned to Google LLC during the time frame of the fake call.²
- b. On April 10, 2023, at approximately 11:45 p.m., the Montgomery County Radio Room received a call from telephone number (803) 814-5376. The caller identified himself as Julian and reported that he took too many Adderall pills. The caller could not confirm township, but stated he was a 17-year-old male and he took 28 Adderall pills. The caller stated that his mouth was foaming and that he

¹ The identify of VICTIM A, a juvenile, is known to law enforcement but is not being used here to preserve her anonymity.

² Through my training and experience, I know that Bandwidth.com services Voice Over Internet Protocol (“VOIP”) based telephone numbers. These numbers can be assigned to various VOIP providers, including Google LLC.

took the pills on purpose. Ambler Ambulance responded to the scene as well as the Ambler Borough Police Department, who determined the call was false. The phone number came back to Bandwidth.com, which later advised that the number was assigned to Google LLC during the time frame of the fake call.

- c. On April 12, 2023, at approximately 2:09 p.m., the Montgomery County Radio Room received a call from telephone number (760) 523-3085 reporting a shooting. The caller reported his name to be Mele Kotz. He told dispatchers that his neighbor put a gun to his head last night and said he would kill him if he told anyone. The caller reported there is a large meth lab upstairs, that his neighbor showed him last night, and the neighbor is home now. The caller reported he heard a gunshot five minutes ago and it sounded like a revolver. The caller reported that a black SUV just pulled away with a Hispanic male inside. The caller reported three men but no tag info and said it was headed towards Chestnut Street. The phone call was later determined to be false. The phone number came back to Bandwidth.com which later advised that the number was assigned to Google LLC during the time frame of the false call.
- d. On April 12, 2023, at approximately 6:41 p.m., the Montgomery County Radio Room received another call from telephone number (760) 523-3085 reporting a shooting. The caller reported his name to be Yuno Wenkeschitz. The caller told the dispatcher that he shot his mom in the chest. The dispatcher noted that the caller was speaking strangely. Dispatcher notes indicate that the call was transferred from Philadelphia County and the caller did not know crossroads at first. The caller said that this was after a dispute over cryptocurrency. The caller said he was still holding the gun and will blow up hospitals if he sees any police. The caller reported that his mother had been dead for ten minutes and CPR will not help. The phone call was later determined to be false. The phone number came back to Bandwidth.com which later advised that the number was assigned to Google LLC during the time frame of the false call.

11. On April 14, 2023, at 1:13 a.m. the Ambler Police Department received a report that two masked males used a brick to smash the Blink doorbell camera at VICTIM ADDRESS 1 and then proceeded to throw a brick through the glass front door. The brick had a handwritten note affixed which read “[VICTIM A] Yuna msg us or else[.]”

12. Ambler Police Department detectives responded to the April 14, 2023, bricking attack at VICTIM ADDRESS 1 and were advised by the homeowners that a female named “[VICTIM A]” lived directly next door (“VICTIM ADDRESS 2”). The detectives went to

VICTIM ADDRESS 2 where they met two juvenile females: VICTIM A, who is 15 years old, and VICTIM B, VICTIM A's older sister who is 17 years old. Both VICTIM A and VICTIM B live at VICTIM ADDRESS 2. VICTIM B told the detectives that the recent Swatting attacks involved the "Comm Group" online.

13. I am familiar with "the Comm" based on my conversations with other law enforcement agents in the Eastern District of Pennsylvania and elsewhere. I know that this group regularly commits cybercrimes such as cryptocurrency thefts and Swattings. I also know that the group commits "in real life" acts of violence, including brickings, shootings, and firebomb attacks. The information provided by VICTIM B attributing the Swattings and bricking to "the Comm" is consistent with the criminal activity that this group regularly conducts.

**Investigation into SnapChat Account "Wissahickonhs," Believed to Be Used By
WILLIAMS and Nationwide Bomb Threats**

18. Snapchat also provided subscriber information related to the other accounts that had been used to harass VICTIM A and VICTIM B. Of note, the account "Wissahickonhs" was subscribed to the email address ideijshsha@icloud.com. The user of that account sent a friend request to VICTIM A's Snapchat account on April 9, 2023.

19. On May 12, 2023, Ambler Police Department contacted the FBI in reference to numerous nationwide bomb threats being made referencing VICTIM A and VICTIM ADDRESS 2. Emails were sent to hundreds of schools and universities describing VICTIM A's purported plans to commit acts of mass violence. These emails caused significant disruptions at schools and universities across the country, especially because they occurred on a weekend when many schools were hosting graduations. The email message sent to the schools stated, in part:

I cannot handle life anymore and that is so sad to say because I have so many things I wanted to do and places I wanted to see, but I think it is for the best. I have made ammonium nitrate and nitrogen bombs and I am going to be going to your workplace, and blowing it up as

my last final farewell to this hell hole we call earth, and if anyone tries to stop me it won't end well, because I also have timed explosives at my high school, which is the Wissahickon High School, and the in Ambler incase anything happens. Do not send anyone to my house before I go through with this as I have my fathers AR-15 and I will not hesitate to kill myself or anyone who tries to stop this from happening. You are all going to die a terrible death. Everyone at your school is going to die.

I have reviewed examples of the e-mails sent to the universities. The text of the e-mail listed VICTIM A as the sender and VICTIM ADDRESS 2 as her residence.

20. Pursuant to a Title 18 U.S.C. § 2702 emergency request,³ Apple provided subscriber information for the ideijshsha@icloud.com account that was associated with the “Wissahickonhs” Snapchat account” as described above; the account was linked to a device with Directory Services Identifier (DSID) number 20979092501 and had a listed subscriber of “henry johnson” with an address of 1991 Taylor Ave, San Fransisco [*sic*], California 94103” and a verified number of 628-230-0065. A verified number is a phone number that the subscriber must utilize to verify an account during account creation. The Apple records further revealed that the iCloud account was created on April 7, 2023. Accordingly, I believe that the creator of this iCloud account had access to phone number 628-230-0065 (the “0065 NUMBER”). Based on open source research, I determined that the 0065 NUMBER is serviced by Verizon Wireless.

21. Pursuant to a Title 18 U.S.C. § 2702 emergency request, Verizon Wireless advised that the 0065 NUMBER is operated by TracFone. Additionally, Verizon Wireless provided geolocation information showing that the device associated with the 0065 NUMBER was located in the area of 111 Taylor Street in San Francisco, California. Due to the 0065 NUMBER being serviced by TracFone, Verizon Wireless was not able to provide a named subscriber for the

³ Emergency requests were issued because of the volume of threats that were received and because the threats indicated that bombs would be detonated.

account. However, Verizon Wireless advised that the cellular device had been assigned multiple phone numbers over time. As of April 14, 2023, Verizon identified the current cellular phone number associated with the device as (415) 553-0686 with a geolocation of Latitude 37.783296 and Longitude 122.410923, which resolves to 111 Taylor Street, San Francisco, California—the defendant residence. Additionally, Verizon Wireless provided call records for the account, which included a call on April 11, 2023 to (267) 845-9999, a number serviced by Bandwidth.com. As mentioned above, Bandwidth.com was the service used in the April 2023 Swatting attacks on VICTIM ADDRESS 1.

22. Pursuant to a Title 18 U.S.C. § 2702 emergency request, TracFone provided subscriber information for the 0065 number as “IVAN ROLDIN,” with an address of “111 Taylor St, San Francisco, CA,” (that is, the SUBJECT PREMISES), and email address ivanroldin1739@gmail.com. Per open-source searches, the SUBJECT PREMISES is a transitional housing facility. Pursuant to a Title 18 U.S.C. § 2702 emergency request for Verizon, they provided the following information associated to the 0065 number:

- a. **IMEI: 354454770130095**
- b. **IMSI: 311480834277369**
- c. **Make: Apple**
- d. **Model: iPhone SE 64 GB Black**
- e. **Provider: StraightTalk**

Interview with VICTIM A

23. On May 15, 2023, VICTIM A was interviewed by myself and other government officials. VICTIM A advised, among other things, that she was a member of “The Comm” and knew of a sub-groups named “ACG.” VICTIM A stated that ACG was known in The Comm to

conduct Swatting attacks and brickings and that ACG members made their money by stealing and online gambling.

24. In or around the fall of 2022, VICTIM A accepted a Snapchat friend request from WILLIAMS. VICTIM A knew WILLIAMS to use Snapchat accounts “@DHMU” and “@FOE.” VICTIM A stated that she did not realize that she had locational services enabled upon accepting the friend request and, thus believes that she inadvertently revealed the location of her home to WILLIAMS. Over the next few months, VICTIM A conversed online with WILLIAMS via Snapchat, Telegram and Discord. After WILLIAMS went to jail, as further described below, VICTIM A decided not to have any more contact with him. In or around April 2023, VICTIM A learned that WILLIAMS had been recently released from custody.

25. Upon learning of his release, VICTIM A blocked WILLIAMS from communicating with her online. However, VICTIM A stated that she believes this caused WILLIAMS to attempt to regain communication with VICTIM A by means of other online personas. Starting in April 2023, VICTIM A began receiving unsolicited food deliveries at her home address. VICTIM A noticed that her online food delivery account had an unauthorized access notification, which she attributed to WILLIAMS. VICTIM A stated that arranging for unsolicited food deliveries is a common harassment technique used by the Comm.

26. On May 13, 2023, VICTIM A communicated via her friend’s Telegram account with a person she believed to be WILLIAMS. VICTIM A recognized that it was WILLIAMS based on previous conversations she had had with him. I have reviewed screenshots of this conversation that VICTIM A saved on her cellular device. As shown in the screenshot, the messages to VICTIM A threaten to “bomb [her]” and “get active” if she did not communicate with him.

Background on Braiden WILLIAMS

27. During the course of my investigation, I have consulted with FBI agents in the Kansas City Field Office who have been investigating a group of cyber-criminal actors who refer to themselves as the Comm. I learned that the Comm consists of a geographically diverse group of individuals, organized in various subgroups, all of whom coordinate through online communication applications such as Discord and Telegram to engage in various types of criminal activity to include corporate intrusions, SIM swapping, cryptocurrency theft, commissioning in real life violence, and Swatting. One of the subgroups within the Comm refers to itself as ACG and has been engaged in all of the described illegal activity since at least the summer of 2021. ACG is organized in a hierarchical manner with two leaders at the top who direct other members to perform various roles on behalf of ACG and to enrich themselves and the other members.

28. WILLIAMS was a member of the Comm and worked with ACG on multiple occasions to conduct SIM swaps, steal cryptocurrency, and launder the stolen cryptocurrency before sending them to the group's leaders. From at least April to July of 2022, WILLIAMS participated in multiple SIM swaps and hundreds of thousands of dollars in subsequent theft. Review of WILLIAMS' iCloud account, bank account records, and cryptocurrency wallets all confirm his activity with ACG and participation in the conspiracy.

29. On July 22, 2022, WILLIAMS was charged by criminal complaint in the Northern District of California, Case No. 3-22-mj-70962, with conspiracy to violate 18 U.S.C. § 1030(a)(2)(C) by intentionally accessing a computer without authorization and thereby obtain information from a protected computer, in violation of 18 U.S.C. § 371. The complaint is based on WILLIAMS's activities with The Comm subgroup ACG. The Honorable Alex G. Tse issued an arrest warrant on July 22, 2022, and WILLIAMS was arrested by the FBI in Iola, Kansas on the same day.

30. On July 27, 2022, following a detention hearing in the District of Kansas, WILLIAMS was released with conditions prohibiting his possession and use of any internet capable device, except to attend court hearings via Zoom in the presence of his third-party custodian. *United States v. Williams*, 2:22-mj-08157-ADM, Dkt. 6, D. Kansas (Jul. 27, 2022).

31. On August 11, 2022, WILLIAMS made his initial appearance in the Northern District of California via Zoom webinar before the Honorable Sallie Kim. 3-22-mj-70962, Dkt. 7. On August 12, 2022, the Court modified WILLIAMS' bail conditions prohibiting all access to the internet and the possession and use of internet-capable devices but for three exceptions, including access to Zoom with a third party custodian to attend court and meet with counsel; to watch streaming television; and as pre-approved by pretrial services to pursue employment and educational opportunities, also with his third party custodian. *Id.* Dkt. 9. WILLIAMS was permitted to have a cell phone without internet access that he could use to make calls and send text messages.

32. On November 10, 2022, following a high-speed chase, WILLIAMS was arrested by local law enforcement in Kansas. He remained in local custody and in early February 2023, WILLIAMS was again taken into custody by the U.S. Marshalls based on a federal warrant issued for violating the terms of his bail conditions.

33. On February 17, 2023, the Honorable Sallie Kim ordered that WILLIAMS be transferred from the District of Kansas to the Northern District of California, and that he be committed to the custody of the Attorney General. Dkt. 25.

34. On March 30, 2023, the Honorable Sallie Kim ordered WILLIAMS released to the halfway house at 111 Taylor Street, San Francisco, CA, with all conditions of the previous bond (other than residence) remaining in place.

Search Warrant Execution at 111 Taylor Street

35. On May 17, 2023, pursuant to a search warrant authorized in the Northern District of California, FBI agents and other law enforcement officers executed a federal search warrant at 111 Taylor Street, Room 217, on the person of BRAIDEN WILLIAMS and of a cellular device with International Mobile Equipment Identify (IMEI) number 354454770130095 and assigned International Mobile Subscriber Number (IMSI) 311480834277369. This is the same device that was associated with the “Wissahickonhs” Snapchat account that previously harassed the victim, as described above.

36. On May 17, 2023, prior to executing the search warrant VICTIM A received a message from (415) 553-0686, the Verizon identified current cellular phone number associated with the target device. The message read [sic]:

[Victim A] ur so fucking stupid
i got all the lines on ur cell plan
aswell [sic] looked ill sim each one
and put notes on their acc so I can keep tabs on you u stupid
little bitch

37. Based upon my training and experience, I understand the message to be a threat. Specifically, I understand the sender to be threatening to SIM swap VICTIM A. A SIM swap is a type of cybercrime in which an actor gains access to a victim’s phone in order to gain further access to bank or cryptocurrency accounts.

38. During the execution of the search warrant, an agent called telephone number (415) 553-0686, referenced in paragraph 36. The Agent then located the target phone after hearing it ring. The target device was seized from WILLIAMS’ pocket. This was the same target device referenced in paragraph 35. Seizing agents noted that the device was actively being used to

participate in Discord Audio call labeled ACG MEETING, with a depiction of utilizing a VPN service.

39. Agents and other law enforcement officers also located piece of paper with numerous notes. The notes included the notation “call [nickname for Victim A],” which I believe is a reference to Victim A.

40. In sum, my investigation has shown that VICTIM A has been targeted by a course of conduct that would reasonably place a person substantial emotional distress. Specifically, her name has been listed in numerous bomb threats and Swatting calls have been directed to her residence. She has also been targeted with threats of being victimized by cyber crime. My investigation has shown that a Snapchat account that targeted her was associated with a device that was recovered from WILLIAMS. VICTIM A also provided law enforcement with messages from WILLIAMS stating that he would “bomb” her and “get active.” When WILLIAMS was arrested in a residential reentry facility—where he was in the custody of the US Marshalls—agents recovered a paper with writing that referenced VICTIM A’s nickname. I therefore believe that probable cause exists to believe that WILLIAMS has violated 18 U.S.C § 2261A.

CONCLUSION

41. I request that the Court issue an arrest warrant authorizing the Federal Bureau of Investigation or any authorized law enforcement officer to arrest WILLIAMS.

42. Because WILLIAMS's co-conspirators are not aware of the FBI's investigation, if they learn of the investigation, they are likely to destroy evidence and may flee. I therefore request that all papers associated with this application and arrest warrant be sealed. For the same reason, I request that the papers associated with this arrest warrant application be filed under seal.

Respectfully submitted,

/s/ Zachary Fuller
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me
on May 17, 2023:

Lynne A. Digitally signed
by Lynne A.
Sitarski
Date: 2023.05.18
10:56:47 -04'00'
Sitarski

/s/ Lynne A. Sitarski
HONORABLE LYNNE A. SITARSKI
UNITED STATES MAGISTRATE JUDGE